

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA ALEXANDRIA

DIVISION

2022 AUG 24 P 4:42

Jane Doe, a pseudonym)
)
Plaintiff,)
)
v.)
)
ABA Accredited University,)
American Bar Association,)
Department of Education)
)
Defendants.)

REDACTED

Civil Action No.
1:22-cv-00947-PTG-JFA

**MEMORANDUM IN SUPPORT OF EMERGENCY MOTION
TO FILE UNDER SEAL (REDACTED)**

Plaintiff moves the Court for an Order granting leave to file their Memorandum in Support of Motion for a Preliminary Injunction under seal pursuant to Local Rule 5.

Plaintiff filed, with this Court, Motions to Seal (various documents) and File Under Pseudonym using the pseudonym in the case caption on August 19, 2022. Plaintiff incorporates the facts and arguments put forth in the briefs in support of the August 19th Motion to Seal and Motion to File Under Pseudonym filed with this Court as if fully set forth herein, in support of the instant Motion to Seal.²

PROCEDURAL POSTURE

On August 19, 2022, Plaintiff, Jane Doe, *pro se*, moved the Court under Local Rule 5, *inter alia*, for an Order granting permission to sue defendants, ABA Accredited University, the American Bar Association (ABA), and the Department of Education (DOE) under pseudonym,

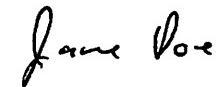
² Plaintiff has a Motion to File Under Pseudonym pending before the Court, and submits this Motion using the pseudonym.

as well as to use a pseudonym to conceal the name of the ABA Accredited Law School, and to file a complaint, motions and supporting memorandum of law with the pseudonyms and partially under seal, with portions of the filings redacted in the versions to be made public, and unredacted versions to be kept under seal. On August 22, 2022, the Court Denied Plaintiff's Motion for a TRO, ORDERED Plaintiff's Memorandum in Support of Preliminary Injunction (Dkt. 7) STRICKEN noting its lack of compliance with Local Rule 7(f) and further ordered that Plaintiff shall file a revised Memorandum in Support of Preliminary Injunction (Dkt. 7) in compliance with all Local Rules of the Eastern District of Virginia and the Federal Rules of Civil Procedure no later than Wednesday, August 24, 2022.

REQUESTED RELIEF

WHEREFORE, the plaintiff requests that this Court issue an Order granting Plaintiff leave to file BRIEF IN SUPPORT OF EMERGENCY MOTION FOR RECONSIDERATION, OR, IN THE ALTERNATIVE EMERGENCY CERTIFICATION FOR INTERLOCUTORY APPEAL, UNDER SEAL.

Respectfully Submitted:



Jane Doe